



## INTEROFFICE CORRESPONDENCE

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FROM S. G Stiger, Environmental Restoration Program Division, Bldg 080, X8540 *SS*

SUBJECT LESSONS LEARNED, READINESS ASSESSMENT OF SUBCONTRACTOR TRAINING AND QUALIFICATION REQUIREMENTS - SGS-525-94

DOE Order 5480 19

Action Discuss with all Project Managers and affected personnel

In accordance with 2-G21-ER-ADM-18 03, Environmental Restoration Program Division Readiness Assessments, Environmental Operations Management (EOM) conducts Readiness Assessments (RAs) for ERPD-funded and/or managed projects and activities. A recently conducted RA resulted in a conditional authorization to operate which was necessitated due to lack of subcontractor training compliance. This lessons learned document is being issued because this instance underscores a generally significant area of concern encountered through the RA program.

Conditional authorizations are, of course, problematic to project management. The full scope of activities cannot be initiated until personnel are qualified. Such authorizations are also problematic to the RA program in that they threaten the integrity and value of the readiness verifications: either a state of readiness exists, or it does not. Attempts to ameliorate deficient conditions shortly before a field date result in considerable additional effort and stress for all concerned and make no direct contribution towards eliminating the deficiencies.

In this recent instance, none of the proposed subcontractor personnel were completely qualified/current under the applicable training requirements. Further, several of the proposed personnel were deficient in baseline requirements, including Hazardous Waste Operations as required under OSHA 29CFR 1910.120, Resource Conservation and Recovery Act (RCRA) Hazardous Waste Training, General Employee Training (GET) Subcontractor, and others. The subcontractor in this instance is not a newcomer to Rocky Flats Environmental Technology Site (RFETS), making such non-compliant status even less understandable. At present, the project's operations are restricted until the personnel roster is finalized and completion of the applicable training is verified. While the level of noncompliance in this particular instance was extreme, the RA program continues to encounter similar situations relative to training.

It is apparent that project management often either lacks an understanding of applicable training requirements and/or fails to clearly communicate them to subcontractors. It is also evident that either some project managers do not utilize their training coordinators and/or the coordinators fail to perform adequately.

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Additionally, and of more significance, is a laissez-faire attitude all too frequently encountered about training requirements. This attitude is in direct contradiction to both the Department of Energy/Rocky Flats Field Office (DOE/RFFO) and RFETS policies and top-level management specific direction. It frequently results from (continuing) perceptions, correct or not, that (a stated) requirement is unnecessary. Particularly at the point of a RA, this attitude is both inappropriate and counterproductive. Positive and direct efforts to clarify and/or change the application of requirements are wholly appropriate. It should again be emphasized the RA program does not establish requirements, but verifies compliance with those that have been determined as applicable.

The RA program includes steps and directions which have been specifically designed and are communicated to minimize the conditions indicated above. Awareness of and positive response to the following will help minimize the recurrence of situations such as described:

- Project planning should ensure that work scope is sufficiently defined and fixed before procurement documents are issued. Every Statement of Work should contain a project-specific list of training and qualification requirements as provided by ERPD Training and Qualification (T&Q). Scope and budgets do, indeed, shift in our environment. However, it is much easier and more cost efficient to make changes to a previously cited list of requirements than it is to (completely) develop such a list after a contract has been awarded.
- The RA program emphasizes the importance of training and qualification compliance. It is extremely important that the responsible manager be fully cognizant of the project's requirements in this regard, and that the manager also be fully cognizant of the status of the project subcontractor in regards to those requirements. The RA program clearly encourages the manager to contact ERPD T&Q as early as possible in the project cycle, not two or three weeks prior to field mobilization. If a training needs analysis has not already been performed (in conjunction with the procurement process as cited above) and/or if scope has changed, T&Q will provide a list of the required courses and briefings. EOM cannot issue a RA Checklist until T&Q has provided this information. T&Q cannot provide it unless the manager requests it.
- Recognizing that all personnel assigned to a project will not require all project-specific training, the RA requires that a responsibility-based personnel matrix be used for verification of training compliance. The required matrix is rarely provided, however. Usually (often one week or less prior to a desired field date) the RA is given a subcontractor's roster which is not project-specific, carries little, if any, indication as to responsibility (and, therefore, applicability of training), and is impossible to decipher relative to the training dates provided. Often, the responsible manager is not even aware of which personnel will be working on the project! As a result, the RA devotes significant resources (often just prior to the desired field date) in determining applicability as well as status and compliance. The manager should have a clear status on this information well in advance of the field date. This should not be a last minute service provided by the RA.

Distribution  
September 30, 1994  
SGS-525-94  
Page 3

- Finally, related to, but separate from, subcontractor training issues, RAs also continue to indicate that EG&G Rocky Flats, Inc. project personnel are also deficient in training requirements. These deficiencies are often in areas such as Conduct of Operations (COOP), Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations, RCRA Hazardous Waste Training, and General Employee Training. These have been clearly determined by RFETS and ERPD management to be "baseline"

Training profiles are under development which will greatly assist in a reasonable graded applicability of requirements, particularly as related to non-field personnel. However, managers should be aware that (multiple) deficiencies in compliance with baseline requirements such as OSHA, RCRA, and GET, as well as project-specific requirements, may preclude authorization to operate. The RA program is also designed to help managers avoid such consequences, but the responsibility for maintaining compliance is the manager's.

Through the RA program, EOM has gone to considerable effort to facilitate project compliance with health and safety, environmental, regulatory, and operational requirements. Training and qualification provide the major vehicle for meeting many of these requirements. The level of compliance deficiencies being exposed by the RA program must be reduced.

Please feel free to contact Dave Brown on extension 8745 for clarification or additional information

DSB bjw

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3/3